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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

TALITHA BROUGHTON,) Case No: 2:18-cv-02188-JAD-GWF
Plaintiff)
v.)
NANCY A. BERRYHILL, Acting)
Commissioner of Social Security,)
Defendant.)

) **STIPULATION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S CROSS**
) **MOTION TO AFFIRM**
)
) **(First Request)**
)
)

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days to Wednesday, May 29, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including ten district court merits briefs due in the next four weeks, as well as two Ninth Circuit responsive briefs to complete.

On April 29, 2019, Plaintiff's counsel informed Defendant by email that he had no objection to this extension.

Respectfully submitted,

Date: April 29, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

By:

/s/*Cyrus Safa

CYRUS SAFA

*authorized by email April 29, 2019

Attorney for Plaintiff

Date: April 29, 2019

NICHOLAS A. TRUTANICH

United States Attorney

By:

/s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Assistant Regional Counsel

Attorneys for Defendant

Of Counsel

Jeffrey Chen

Assistant Regional Counsel

Social Security Administration

IT IS SO ORDERED.

DATE: 4/30/2019

George Foley Jr.
HONORABLE GEORGE FOLEY, JR.
United States Magistrate Judge